

Law Offices of Special Hagan

196-04 Hollis Avenue
Saint Albans, NY 11412

INVOICE

Melissa Kaye

500 E. 77th Street Apt. 239
New York, NY 10162

PRE-BILL

Invoice 10002

Date	Feb 25, 2020
Terms	N/A
Service Thru	Feb 25, 2020

In Reference To: Kaye v. H + H et. al. (Labor)

Date	By	Services	Hours	Rates	Amount
10/18/2018	SH	Draft: Email correspondence with M. Kaye and revision of reasonable accommodation request.	0.30	\$ 350.00/hr	\$ 105.00
10/25/2018	SH	Email Correspondence: Drafting Email correspondence to Kevin Marazzo, H + H EEO Officer.	0.10	\$ 350.00/hr	\$ 35.00
10/30/2018	SH	Email Correspondence: Drafting Email correspondence to Ricardo Granderson, regarding the denial of Kaye's request for reasonable accommodation.	0.10	\$ 350.00/hr	\$ 35.00
12/17/2018	SH	Email Correspondence: Drafting Email correspondence regarding death of brother. Request for bereavement time.	0.10	\$ 350.00/hr	\$ 35.00
01/02/2019	SH	Email Correspondence: Email exchange between January 2 through January 4th. Addressed the denial of FMLA request.	0.20	\$ 350.00/hr	\$ 70.00
01/08/2019	SH	Email Correspondence: Email regarding the restoration of FMLA, addressed to A. Jain.	0.20	\$ 350.00/hr	\$ 70.00
01/10/2019	SH	Email Correspondence: Email correspondence regarding request for reasonable accommodation for Kaye. Request to address her medical diagnoses.	0.10	\$ 350.00/hr	\$ 35.00
01/16/2019	SH	Email Correspondence: Email correspondence regarding call from EEO Officer. Drafted email and spoke on phone regarding request.	0.40	\$ 350.00/hr	\$ 140.00
02/15/2019	SH	Email Correspondence: Drafting of email regarding request for FMLA; Email addressed to Mendez.	0.10	\$ 350.00/hr	\$ 35.00

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02/15/2019	SH	Email Correspondence: Drafting of email regarding expiration of certification and the inclusion of D. Mundy.	0.20	\$ 350.00/hr	\$ 70.00
02/15/2019	SH	Email Correspondence: Drafting of email regarding violation of FMLA. Email was addressed to Wangel.	0.30	\$ 350.00/hr	\$ 105.00
02/16/2019	SH	Email Correspondence: Drafting of email regarding breach of confidentiality and FMLA.	0.10	\$ 350.00/hr	\$ 35.00
02/16/2019	SH	Email Correspondence: Drafting of email regarding follow up on concerns about the operations of the Bronx Clinic.	0.10	\$ 350.00/hr	\$ 35.00
02/22/2019	SH	Email Correspondence: Letter and Email correspondence to Quintero.	0.30	\$ 350.00/hr	\$ 105.00
02/22/2019	SH	Email Correspondence: Letter and Email correspondence to A. Jain	0.10	\$ 350.00/hr	\$ 35.00
03/01/2019	SH	Email Correspondence: Letter and Email correspondence regarding performance evaluation.	0.10	\$ 350.00/hr	\$ 35.00
03/04/2019	SH	Email Correspondence: Draft CHS Complaint.	1.20	\$ 350.00/hr	\$ 420.00
03/11/2019	SH	Email Correspondence: Draft email regarding pfishing and identity theft.	0.30	\$ 350.00/hr	\$ 105.00
03/29/2019	SH	Email Correspondence: Draft email regarding forced retirement.	0.10	\$ 350.00/hr	\$ 35.00
04/02/2019	SH	Email Correspondence: Meeting with Yang in June 2018.	0.10	\$ 350.00/hr	\$ 35.00
04/04/2019	SH	Email Correspondence: Email regarding NYCERS (Email and Letter)	0.10	\$ 350.00/hr	\$ 35.00
04/10/2019	SH	Email Correspondence: Email regarding Corporate Compliance findings (drafting of correspondence).	0.10	\$ 350.00/hr	\$ 35.00
04/11/2019	SH	Correspondence: Letter to Judge Oetken re. request for extension of time.	0.20	\$ 350.00/hr	\$ 70.00

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04/12/2019	SH	Correspondence: Letter to Judge Oetken re. request for extension of time to serve complaints.	0.10	\$ 350.00/hr	\$ 35.00
04/17/2019	SH	Email Correspondence: Email and letter regarding coverage of center in June and Dr. Mullan's absence.	0.20	\$ 350.00/hr	\$ 70.00
04/24/2019	SH	Prepped Summonses: Prepped summonses to serve on named defendants. Requested Court's so ordered stamp.	0.80	\$ 350.00/hr	\$ 280.00
04/30/2019	SH	Drafting of Amended Complaint: Drafting and filing of Amended Complaint.	10.00	\$ 350.00/hr	\$ 3,500.00
05/06/2019	SH	Email Correspondence: Email to Patsos Corporate Compliance officer and letter re. Teleakie Parker.	0.30	\$ 350.00/hr	\$ 105.00
05/15/2019	SH	Email Correspondence: Email to to A. Jain regarding taking annual leave and letter.	0.10	\$ 350.00/hr	\$ 35.00
05/17/2019	SH	Email Correspondence: Email and letter regarding compensation for jury duty.	0.20	\$ 350.00/hr	\$ 70.00
05/29/2019	SH	Email Correspondence: Email following up on FMLA usage, points out discrepancy.	0.10	\$ 350.00/hr	\$ 35.00
06/05/2019	SH	Meeting: Meeting with Kaye.	2.00	\$ 350.00/hr	\$ 700.00
06/10/2019	SH	Email Correspondence: Email correspondence about time card matters. Chain started on June 10 through June 14, 2019.	0.30	\$ 350.00/hr	\$ 105.00
06/12/2019	SH	Email Correspondence: Email correspondence regarding request for reasonable accommodation form.	0.10	\$ 350.00/hr	\$ 35.00
06/14/2019	SH	Email Correspondence: Email correspondence and research on reasonable accommodation request for Kaye ; case law and LEXIS NEXIS files.	1.00	\$ 350.00/hr	\$ 350.00
06/16/2019	SH	Email Correspondence: Email and letter addressed to Caedmon.	1.00	\$ 350.00/hr	\$ 350.00

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06/18/2019	SH	Email Correspondence: Email and letter regarding request for bereavement leave (step-father).	0.10	\$ 350.00/hr	\$ 35.00
06/18/2019	SH	Email Correspondence: Email to Nate Santamaria re. Andrea Swenson and pfishing email and credentialing.	0.10	\$ 350.00/hr	\$ 35.00
06/18/2019	SH	Email Correspondence: Email and letter addressed to Donna Fong regarding discrepancy between FMLA usage and letter.	0.30	\$ 350.00/hr	\$ 105.00
06/21/2019	SH	Email Correspondence: Email regarding Ford's request to meet about recording exams and Swenson complaint.	0.10	\$ 350.00/hr	\$ 35.00
06/21/2019	SH	Email Correspondence: Email and letter regarding FMLA discrepancy and email.	0.10	\$ 350.00/hr	\$ 35.00
06/24/2019	SH	Email Correspondence: Email and research (PACER)	0.50	\$ 350.00/hr	\$ 175.00
06/24/2019	SH	Research: Briefing on case/strategy.discussion of procedure and advice.	0.30	\$ 350.00/hr	\$ 105.00
06/24/2019	SH	Research: Scheduling prep for Corporate Compliance meeting.	0.10	\$ 350.00/hr	\$ 35.00
07/02/2019	SH	Research: Email and letter for reasonable accommodation request (application).	0.10	\$ 350.00/hr	\$ 35.00
07/04/2019	SH	Research: Email and letter to A. Jain regarding traveling to do examinations.	0.50	\$ 350.00/hr	\$ 175.00
07/05/2019	SH	Research: Email and letter to Doctor's Council regarding pfishing email.	0.30	\$ 350.00/hr	\$ 105.00
07/05/2019	SH	Research: Email response to A. Jain regarding traveling to do exams. (Email and letter)	0.30	\$ 350.00/hr	\$ 105.00
07/11/2019	SH	Research: Draft letter to union re. pre-disciplinary charge.	0.50	\$ 350.00/hr	\$ 175.00

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07/15/2019	SH	Email Correspondence: Rebuttal to pre disciplinary charge.	1.00	\$ 350.00/hr	\$ 350.00
07/15/2019	SH	Discovery: Preparation of Discovery demands and requests for admissions.	8.00	\$ 350.00/hr	\$ 2,800.00
07/23/2019	SH	Correspondence: Letter to Judge Oetken requesting to re=schedule scheduling conference.	0.20	\$ 350.00/hr	\$ 70.00
07/26/2019	SH	Correspondence: Letter to Judge Preska re. request for the assignment of a mediator.	0.10	\$ 350.00/hr	\$ 35.00
07/26/2019	SH	Correspondence: Second letter to Judge Preska re. request for the assignment of a mediator.	0.10	\$ 350.00/hr	\$ 35.00
07/30/2019	SH	Email Correspondence: Drafting email regarding FPECC offsite Examination Policy.	0.10	\$ 350.00/hr	\$ 35.00
07/31/2019	SH	Email Correspondence: Drafting email and letter to A. Jain regarding Brayton.	0.30	\$ 350.00/hr	\$ 105.00
08/02/2019	SH	Email Correspondence: Drafting email and letter to S. Kent regarding licensing documentation.	0.10	\$ 350.00/hr	\$ 35.00
08/06/2019	SH	Email Correspondence: Drafting email and letter regarding rebuttal. This was an updated draft and consisted of emails between August 6th and 14th.	0.50	\$ 350.00/hr	\$ 175.00
08/06/2019	SH	Email Correspondence: Drafting email regarding EEO request for reasonable accommodation to Kevin Marazzo.	0.10	\$ 350.00/hr	\$ 35.00
08/06/2019	SH	Email Correspondence: Drafting email regarding EEO request for reasonable accommodation to Kevin Marazzo.	0.10	\$ 350.00/hr	\$ 35.00
08/15/2019	SH	Email Correspondence: Edited letter regarding EEO request for reasonable accommodation to Kevin Marazzo.	0.10	\$ 350.00/hr	\$ 35.00
08/16/2019	SH	Email Correspondence: Final draft of letter/email to K. Marazzo re. reasonable accommodation request.	0.10	\$ 350.00/hr	\$ 35.00

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08/19/2019	SH	Email Correspondence: Email and letter request to review personnel file.	0.20	\$ 350.00/hr	\$ 70.00
08/22/2019	SH	Correspondence: Letter to Judge Oetken requesting withdrawal from Mediation program.	0.20	\$ 350.00/hr	\$ 70.00
08/22/2019	SH	Correspondence: Second letter to Judge Oetken requesting withdrawal from Mediation program.	0.10	\$ 350.00/hr	\$ 35.00
08/25/2019	SH	Correspondence: Request to re-schedule 26(f) conference from September 30, 2019 since parties withdrew from Mediation program.	0.20	\$ 350.00/hr	\$ 70.00
08/27/2019	SH	Email Correspondence: Email and letter to A. Jain regarding Meeting with Brayton. (consists of emails sent between 8/27 and 8/28)	0.10	\$ 350.00/hr	\$ 35.00
08/30/2019	SH	Email Correspondence: Email to A. Jain inquiring about Brayton's supervision.	0.10	\$ 350.00/hr	\$ 35.00
08/30/2019	SH	Email Correspondence: Email to A. Jain inquiring about Brayton's supervision.	0.10	\$ 350.00/hr	\$ 35.00
09/03/2019	SH	Email Correspondence: Email regarding meeting with personnel on August 30th.	0.10	\$ 350.00/hr	\$ 35.00
09/12/2019	SH	Preparation of 26(f) Plan: Preparation of 26(f) Joint Case Management Plan. Email Correspondence and drafting in conjunction with D. Canfield.	1.00	\$ 350.00/hr	\$ 350.00
09/17/2019	SH	Court Time: Attended Pre-Trial Scheduling Conference. (Oetken)	1.00	\$ 350.00/hr	\$ 350.00
09/18/2019	SH	Preparation of 26(f) Plan: Finalizing Case Management Plan w. Donna Canfield.	0.30	\$ 350.00/hr	\$ 105.00
09/25/2019	SH	Draft: Email and letter regarding blocked access to shared calendar.	0.30	\$ 350.00/hr	\$ 105.00
10/03/2019	SH	Draft: Letter to Caedmon regarding tuition and special circumstances.	0.50	\$ 350.00/hr	\$ 175.00

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10/04/2019	SH	Email Correspondence: Email and letter regarding traveling to perform exams. re Judge Collins	0.20	\$ 350.00/hr	\$ 70.00
10/07/2019	SH	Email Correspondence: Request for Kaye's Tax returns.	0.10	\$ 350.00/hr	\$ 35.00
10/07/2019	SH	Draft: Drafting of 26(a)(1) disclosures.	2.50	\$ 350.00/hr	\$ 875.00
10/15/2019	SH	Email Correspondence: Email and letter regarding longevity pay and retention bonus to S. Kent.	0.30	\$ 350.00/hr	\$ 105.00
10/18/2019	SH	Email Correspondence: Email to A. Jain regarding off site examinations.	0.20	\$ 350.00/hr	\$ 70.00
10/22/2019	SH	Draft: Drafting of settlement letter (research and drafting).	2.00	\$ 350.00/hr	\$ 700.00
10/23/2019	SH	Email Correspondence: Draft Email and letter to A. Jain regarding Brayton's lateness.	0.10	\$ 350.00/hr	\$ 35.00
10/25/2019	SH	Email Correspondence: Draft Email requesting to review time and leave balances addressed to Saadya.	0.10	\$ 350.00/hr	\$ 35.00
10/28/2019	SH	Email Correspondence: Draft Email (2 emails) and letter to S. Kent regarding floating holiday.	0.20	\$ 350.00/hr	\$ 70.00
10/29/2019	SH	Email Correspondence: Email and letter to A. Jain regarding Brayton.	0.10	\$ 350.00/hr	\$ 35.00
10/30/2019	SH	Email Correspondence: Email, letter and call.	0.50	\$ 350.00/hr	\$ 175.00
11/01/2019	SH	Email Correspondence: Email and letter chain regarding Brayton's work stoppage. 3 drafts between November 1st and November 6th.	0.30	\$ 350.00/hr	\$ 105.00
11/08/2019	SH	Email Correspondence: Email and letter regarding being docked pay. (2nd letter to Soto)	0.30	\$ 350.00/hr	\$ 105.00
11/13/2019	SH	Discovery: Emails and conference calls to D. Canfield regarding discovery.	0.50	\$ 350.00/hr	\$ 175.00
11/14/2019	SH	Email Correspondence: Email and letter regarding docking of pay (2nd draft).	0.10	\$ 350.00/hr	\$ 35.00

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11/18/2019	SH	Email Correspondence: Emails to Canfield regarding discovery disputes and ESI.	0.80	\$ 350.00/hr	\$ 280.00
11/19/2019	SH	Correspondence: Letter to Oetken, request for intervention re. ESI Protocol.	0.30	\$ 350.00/hr	\$ 105.00
11/20/2019	SH	Email Correspondence: Email and draft letter regarding grievance.	0.30	\$ 350.00/hr	\$ 105.00
11/22/2019	SH	Correspondence: Letter to Judge Cott re. ESI Protocol; request for intervention on discovery.	0.30	\$ 350.00/hr	\$ 105.00
12/02/2019	SH	Email Correspondence: Email and letter regarding Bronx Court Clinic coverage.	0.20	\$ 350.00/hr	\$ 70.00
12/03/2019	SH	Discovery: Responses to Defendants' discovery demands (document requests and interrogatories).	3.50	\$ 350.00/hr	\$ 1,225.00
12/03/2019	SH	Discovery: Production of documents in response to Defendants' discovery demands.	3.00	\$ 350.00/hr	\$ 1,050.00
12/04/2019	SH	Court Time: Court Conference re. ESI Protocol and discovery disputes. Appeared in front of Judge Cott.	1.00	\$ 350.00/hr	\$ 350.00
12/13/2019	SH	Correspondence: Letter to Judge Cott regarding discovery disputes.	0.40	\$ 350.00/hr	\$ 140.00
12/14/2019	SH	Correspondence: Letter to Judge Cott in further support of request for intervention on discovery disputes.	0.30	\$ 350.00/hr	\$ 105.00
12/16/2019	SH	Email Correspondence: Email and letter to Wangel.	0.40	\$ 350.00/hr	\$ 140.00
12/17/2019	SH	Email Correspondence: Emails to Kaye regarding Defendants' first document production.	1.00	\$ 350.00/hr	\$ 350.00
12/21/2019	SH	Email Correspondence: Emails to Canfield regarding production of documents.	0.10	\$ 350.00/hr	\$ 35.00
12/21/2019	SH	Email Correspondence: Emails to Canfield and response to hiring Kaye (Winkler)	0.20	\$ 350.00/hr	\$ 70.00

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12/30/2019	SH	Email Correspondence: Email and letter: regarding resignation to Katz.	0.50	\$ 350.00/hr	\$ 175.00
12/30/2019	SH	Email Correspondence: Email and letter regarding Board of Correction Complaint.	1.00	\$ 350.00/hr	\$ 350.00
01/02/2020	SH	Email Correspondence: Email to Canfield addressing Protective Order. (Discovery)	0.50	\$ 350.00/hr	\$ 175.00
01/03/2020	SH	Email Correspondence: Email to Canfield objecting to the production of tax returns	0.10	\$ 350.00/hr	\$ 35.00
01/06/2020	SH	Correspondence: Letter to Judge Cost regarding Defendants' production of ESI and deficient production of discovery.	0.30	\$ 350.00/hr	\$ 105.00
01/06/2020	SH	Email Correspondence: Email to Canfield and A. DiSenso re. ESI production.	0.30	\$ 350.00/hr	\$ 105.00
01/06/2020	SH	Email Correspondence: Revisions to Board of Correction Complaint (Email and letter)	0.20	\$ 350.00/hr	\$ 70.00
01/06/2020	SH	Email Correspondence: HIPAA Releases Preparation and Production to Canfield.	0.50	\$ 350.00/hr	\$ 175.00
01/07/2020	SH	Email Correspondence: Meet and confer regarding ESI and discovery.	0.80	\$ 350.00/hr	\$ 280.00
01/09/2020	SH	Email Correspondence: Resignation letter and email.	0.20	\$ 350.00/hr	\$ 70.00
01/14/2020	SH	Correspondence: Letter to Judge Cott regarding Defendants' refusal to produce discovery.	0.30	\$ 350.00/hr	\$ 105.00
01/16/2020	SH	Email Correspondence: Emails to Canfield re. letter request specifying Kaye's last day on payroll.	0.10	\$ 350.00/hr	\$ 35.00
01/16/2020	SH	Email Correspondence: Emails to Canfield regarding terms of separation and W2 request.	0.40	\$ 350.00/hr	\$ 140.00

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01/17/2020	SH	Correspondence: Letter to Judge Cott regarding Defendants' refusal to comply with Fed. R. Civ. 26 and 34 (Transparent and cooperative production of discovery)	0.50	\$ 350.00/hr	\$ 175.00
01/17/2020	SH	Motion Practice: Drafted Motion to Compel the production of ESI and discovery.	0.50	\$ 350.00/hr	\$ 175.00
01/22/2020	SH	Email Correspondence: Emails to Canfield regarding request to meet and confer regarding Defendants' deficient response to discovery requests.	0.40	\$ 350.00/hr	\$ 140.00
01/23/2020	SH	Email Correspondence: Emails to Kaye and Najari regarding rebuttal (made revisions).	0.30	\$ 350.00/hr	\$ 105.00
01/27/2020	SH	Email Correspondence: Research on Ramirez lawsuit and email to Kaye.	0.30	\$ 350.00/hr	\$ 105.00
01/27/2020	SH	Email Correspondence: Email to Canfield regarding abdication of examinations.	0.20	\$ 350.00/hr	\$ 70.00
01/29/2020	SH	Motion Practice: Request for 37.2 Conference	0.80	\$ 350.00/hr	\$ 280.00
02/05/2020	SH	Court Time: Conference re. Deficient production of discovery.	1.00	\$ 350.00/hr	\$ 350.00
02/05/2020	SH	Email Correspondence: Review of Defendants' discovery production. 1-1912pdfs.	2.00	\$ 350.00/hr	\$ 700.00

In Reference To: Kaye v. H + H et. al. (Expenses)

Date	By	Expenses	Amount
12/21/2018	SH	Filing Fee for Complaint: Filing fee for Complaint.	\$ 400.00
02/24/2020	SH	Service of Complaints: Service of Amended Complaints	\$ 500.00

Total Hours 69.90 hrs

Total Labor \$ 24,465.00

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Total Expenses \$ 900.00

Total Invoice Amount \$ 25,365.00

Previous Balance \$ 0.00

12/07/2018 Payment - Check (\$10,000.00)

Client paid 10,000 which was deposited in an IOLA trust account.

Balance (Amount Due) \$ 15,365.00